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March 5, 2025

BY ECF:

The Honorable Judge Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: United States v. Amir Elmaani
Case No.: 20-cr-00661-001
Southern District of New York
Letter Motion Seeking Transfer of Legal Firearms

Dear Judge McMahon,

Please be advised that I represent **Amir Elmaani** in the above-referenced action.

Mr. Elmaani was sentenced on October 31, 2023, and surrendered to the BOP on February 13, 2024. He is currently located at Loretto FCI and will be released on February 14, 2027. His registered number is 21374-509.

On January 17, 2025, the FBI returned Mr. Elmaani's electronic devices and miscellaneous items. See Exhibit A, Receipt for Property. The FBI is currently in possession of Mr. Elmaani's legal firearms. He nominates his brother-in-law, Daniel Zare, whom he has known since 2011. The FBI has identified no legal impediment to transferring the firearms to Mr. Zare.

The Government was advised of this letter motion but has no position. We respectfully ask that Your Honor order the transfer of the confiscated firearms to Mr. Zare.

Thank you for your time and consideration in this matter.

Sincerely,
Spodek Law Group P.C.
/s/ Todd A. Spodek
Todd A. Spodek

cc: All Counsel (By ECF).
Amir Elmaani (By First Class Mail).

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: <u>3/6/25</u>

LEMO ENDORSE

3/6/25

If the Government is
of the position that
the weapon should be
returned, and the FBI
believes that it is
appropriate to transfer
the weapon to def's
brother-in-law, the
Court will allow it.

Colleen McMahon

EXHIBIT A

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
Receipt for Property

Case ID: 318C-NY-3011234On (date) 01/17/2025

item (s) listed below were:

- ☐ Collected/Seized
☐ Received From
☒ Returned To
☐ Released To

(Name) Haseeb Bassam(Street Address) 36 Federal Plaza, 14th(City) New York NY 10278

Description of Item (s):

See attachment.

64
1/17/25

Received By:

Haseeb Bassam / Harrison Cade
(Signature)

Received From:

[Signature]
(Signature)

Printed Name/Title:

Haseeb Bassam
/ Harrison Cade

Printed Name/Title:

CHS ion Special Agent

1. 2 iphone batteries ✓
2. iPhone 11 Pro with an Apple battery bank ✓
3. One (1) Black Calendar Book 2015 ✓
4. One (1) Blue Calendar Book 2018/2019 ✓
5. One (1) Black Notebook ✓
6. Belkin Black Router, S/N ✓
7. One (1) HP Laptop, S/N ✓
8. ~~One (1) HP Laptop, S/N~~ *Item 18, Apple laptop* ✓
9. Item 50, Electronic Hard Wallet ✓
10. Item 49, USB Drive 32 GB ✓
11. Item 48, USB Cards (3) ✓
12. Item 47, Notebooks (3) ✓
13. Item 46, Dell Desktop ✓
14. Item 45, Apple Desktop ✓
15. Item 44, Qnap NAS Q17CI09227 Closest to server ✓
16. Item 43, Qnap NAS Q179I10906 Middle ✓
17. Item 42, Qnap NAS Q177I5841 furthest from server ✓
18. Item 41, Apple Macbook Pro ✓
19. Item 34, Apple iPhone ✓
20. Item 33, Lease Agreement ✓
21. Item 32, Documents ✓
22. Item 31, Documents ✓
23. Item 30, Optics x2 DP-12, Roleo 4H ✓
24. Item 29, Flip Optic SN ✓
25. Item 21, Business and Identification documents ✓
26. Item 20, 8 WD hard drives ✓
27. Item 19, Apple laptop C0Z5QJVKGTFM ✓
28. Item 17, Apple laptop C0ZX968FJGHF ✓
29. Item 16, Apple iPad SN ✓
30. Item 15, Business documents ✓
31. Item 14, Business documents ✓
32. Item 13, Key Ledger electronic ✓
33. Item 12, G Raid HD ✓
34. Item 11, Samsung HD ✓
35. Item 10, Oyster computer code ✓

- 36. Item 9, WD Gold Harddrive ✓
- 37. Item 8, Bag of USB drives ✓
- 38. Item 7, Documents ✓
- 39. Item 6, Apple Laptop SN ✓
- 40. Item 5, Documents ✓
- 41. Item 4, Phone cards ✓
- 42. Item 3, BMW book with written key ✓
- 43. Item 2, Apple iPad with cracked screen ✓
- 44. Item 1, Assorted Documents ✓